SUBPART E

MANIFEST SYSTEM, RECORDKEEPING AND REPORTING

265.70 Applicability

East Coast Chemical Disposal, Inc. will operate an on-site, fully enclosed facility for storage, treatment and disposal of hazardous wastes. ECCD will transport from generators to it's facility for treatment and then transport again to a certified disposal area. Some of the materials will be transported to a licensed resource recovery facility.

265.71 The Manifest System

The system contains specifications, labeling, placarding, shipping papers and receiving papers. Disposal will be off-site. In general, ECCD will comply with 40CFR parts 264, 265, 122 and 266 regulations.

265.72 Manifest Discrepancies

ECCD will be its own transporter, therefore, it will return a copy of the manifest to the generator of the waste within 30 days. Should any significant discrepancies in the type or quantity of the waste received be apparent, EPA will be notified should the discrepancy not be resolved.

When ECCD transports to a certified off-site receiving area (within or outside the Commonwealth), a manifest will be prepared on forms provided by EPA and/or DER.

265.73 Operating Record

The operating record will contain detailed information of this facility's operation and will record the following:

- Description and quantity of each hazardous waste received, the method and date of treatment, storage and disposal.
- Location of storage and processing area. No disposal will be done at this facility, only storage and treatment.
- 3. A manifest document number.
- 4. Name, address, telephone number and identification number of generator, transporter, and treatment, storage or disposal facility.
- 5. U.S. D.O.T. shipping name, hazardous waste class and UN number (see 49CFR parts 172.101, 172.102 and 172.103).

- 6. The physical form; solid, liquid or gas total quantity of each hazardous waste by units of weight or volume and the type and number of containers.
- 7. A certification that the named materials are properly certified according to requirements of DOT, EPA and DER.
- 8. The manifest will consist of six (6) copies, with copies 1, 2, and 3 detaching into two (2) parts A and B. Generator will complete Part A of all copies of the manifest, dated and certified.
- 9. For Intrastate shipments, the generator shall retain a complete Copy 2 and Part A of Copy 3 for his records.
- 10. For Interstate shipment of hazardous waste, the generator will detach Part A of Copies 1, 2 and 3, distribute Part A, Copy 1 to the disposer state, Part A, Copy 2 to the generator state and retain Part A, Copy 3 for his records.
- 11. The transporters authorized representation will carry the remaining copies of the manifest along with the shipment.
- 12. When the shipment is delivered to the designated treatment, storage or disposal facility, or to transporter number two (ECCD will be transporter number one), transportee number one will sign, date and certify delivery of the shipment, obtain the signature, date of receipt of shipment and certification of the treatment, storage or disposal facility's (usually ECCD) authorized representative or authorized representative of transporter number two and detach and retain Copy 5 of the manifest.
- 13. Transporter number two, upon delivery of the shipment to the designated treatment, storage or disposal facility, will sign, date and certify the delivery, obtain signature, date of receipt of shipment and certification of the treatment, storage and disposal facility's authorized representative and detach and retain Copy 6 of the manifest.
- 14. For shipments within the Commonwealth of Pennsylvania, the treatment, storage, or disposal facility's authorized representative shall retain complete Copies 1 and 4 of the manifest and return Part B of Copy 3 to the generator.

- 15. Shipments of waste interstate, the treatment, storage or disposal facility's authorized representative will detach and distribute Part B of Copies 1, 2 and 3 of the manifest in the following manner:
 - a. Treatment, storage or disposal facility's authorized representative shall forward Part B of Copy 1 of the manifest to the state in which the designated treatment, storage or disposal facility is located.
 - b. Treatment, storage or disposal facility's authorized representative shall forward Part B of Copy 2 of the manifest to the state in which the generator of the hazardous waste is located and will return Part B of Copy 3 of the manifest to the generator within 24 hours after delivery of the shipment. The treatment, storage or disposal facility will retain Copy 4 for its records.
- 16. Each manifest form shall record a maximum of two (2) transporters. If more than two transporters are to be utilized, the generator shall complete additional manifest forms and reference the first manifest document number on such additional manifest forms.
- 17. If more than four (4) hazardous wastes from the same generators are to be shipped in the same shipment, the generator shall complete additional manifests for each group of four or less hazardous wastes.
- 265.74 Availability, Retention and Disposition of Records
 - 18. Copies of the manifest retained by the generator and the treatment, storage or disposal facility shall be furnished to the Department upon request.
 - 19. The transporter shall not accept a shipment of hazardous waste from a generator or another transporter unless the shipment is accompanied by a completed manifest.
 - 20. A transporter shall not accept or transport a shipment of hazardous waste under the following conditions:
 - a. Leaking, damaged containers not in compliance with requirements.
 - b. Which are not labeled, marked and placarded properly.
 - c. Unless the number and type of containers to be transported are as stated on the manifest.

- 21. Hazardous waste shipments shall be transported only to:
 - a. The hazardous waste storage, treatment and disposal facilities which the generator has designated on the manifest as a facility permitted by EPA or DER to manage such waste or as a facility not within the Commonwealth which is authorized to manage such waste by a State or Federal Government; or
 - b. The next designated transporter.
- 22. A transporter of hazardous waste shall ensure the following are performed:
 - a. The number of copies of the manifest required by EPA and/or DER accompany the shipment of hazard-ous waste at all times.
 - b. The shipment complies with all applicable U.S. D.O.T. and PA D.O.T. requirements and regulations.
 - c. Delivery of the entire quantity of hazardous waste which he has accepted from a generator or a transporter.
- 23. All closure records will be submitted to EPA and/or DER.

265.75 Annual Report

A single copy of an annual report will be submitted to the Regional Administrator by March 1 of each year.

DER will require quarterly reports on forms designated by the Department containing the following information:

- A. The name, identification number, mailing address and the location of the generator.
- B. The name and telephone number of the generator's contact person.
- C. The identification and license number of each transporter.
- D. The name, identification number and address of the HWM facility.
- E. The description, DCT hazardous class and hazardous waste number and date of treatment, storage, or disposal of the hazardous waste.
- F. The amount and units of measure of each hazardous waste in a shipment.

- G. The manifest document number for each hazardous waste.
- H. Signature and certification of the HWM's authorized representative.
- The information required by items C, D, E, F, and G of this sub-paragraph shall be provided for each shipment of hazardous waste and each waste stream within the shipment.

Quarterly reports are due April 30, July 31, October 31 and January 31 of each year.

The operator of this on-site facility shall report the following:

- 1. Emissions, discharges, fires, and explosions.
- 2. Ground water contamination.
- 3. Facility closure (see Subpart G).

265.76 Unmanifested Waste Report

This facility will not accept for treatment, storage or disposal any shipment of hazardous waste without an accompanying manifest. If the generator provides a certification that the waste qualifies for exclusion, then an exception can be made.

265.77 Additional Reports

In addition to the annual report a listing will be made of the following as specified in parts 265.56 (J).

- 1. Releases, fires and explosions.
- 2. Ground water contamination.
- 3. Facility closure.

SUBPART F

GROUND WATER MONITORING

265.90 Applicability

The entire storage and treatment operation at this facility will be indoors, with area dikes to contain leaks or spills. Therefore, there is no need for ground water monitoring.

SUBPART G

CLOSURE

265.110 Applicability
This closure plan will describe the manner by which closing of the facility is planned. Involved in the closure are drums, perhaps tanks and processing equipment.

265.111 Closure Performance Standards

At closure all hazardous waste and hazardous waste residue will be removed from tanks, treated and transferred to a certified disposal area. All drums will have been treated and transferred to a certified disposal area.

Discharge control equipment and discharge confinement structures will be cleaned and decontaminated. All areas of the building will be cleaned, checked and decontaminated as needed. Since all storage and treatment processes will be conducted within this fully enclosed building, no postclosure surveillance is deemed necessary.

When closure is completed, all facility equipment and structures will be properly disposed of, or decontaminated. There will be no further need of maintenance.

The operator will then submit to EPA and/or DER certification both by the operator and an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan.

<u>265.112 Closure Plan: Amendment of Plan</u> We have established the following dates to comply with the regulations although we would not anticipate any logical reason to close the facility on the projected dates.

- 1. Final date waste solvents will be accepted. May 1, 1997.
- 2. Dates for completion of inventory disposal:
 - a. Date that all ignitable solvent will be distilled: May 15, 1997.
 - b. Date that all non-combustible solvent will be distilled: May 31, 1997.
 - c. Date that all clean solvent inventory will be disposed of off-site: June 15, 1997.
 - d. Date that all equipment, confinement structures and building areas will be decontamined: June 7, 1997.

- e. Date that all hazardous waste (still bottoms or non-recyclable waste) will be disposed off-site, (Class 1 landfill, incinerator or other approved disposal method): June 7, 1997.
- 3. Final closure will be completed June 15, 1997.
- 4. Total time required to close the facility: 46 days.

265.113 Time Allowed for Closure

As indicated in the closure plan 265.112 - final date for receiving hazardous waste is May 1, 1997, final closure will occur on June 15, 1997 for a total closing time needed for the facility of 46 days.

265.114 Disposal of Decontamination of Equipment
To proceed with closure, the ignitable inventory would be
phased out first. Processing tanks would then be processed
with chlorinated or other non-combustible solvents. This
procedure would result in all of the processing tanks being
washed out with non-combustible material, leaving them noncombustible. In this cleanup procedure, pumps, lines,
stills, condensers and related equipment would be left noncombustible and free of contamination. Approximately 50
gallons of recycled chlorinated solvent will be used for
tank cleaning. The solvent would be disposed of in an
approved landfill or approved method of disposal.

Storage drums (D.O.T. Specifications drums) are used by this facility. Every drum will be sent to a drum reconditioner when empty. Still bottoms will be sent to a certified landfill for disposal. These are non-combustible and should pose no problem.

Any drums not reconditionable would be sent to a certified landfill for disposal.

265.115 Certification of Closure

When closure is complete, a certification of closure will be prepared and certified by the operator and a registered professional engineer, stating that the closure is in accordance with the specifications in the approved closure plan.

265.117 Post-Closure Care

No post closure plan will be needed.

265.118 Amendment of Plan

The present plan calls for a 15 year period of operation - should a shorter or longer operational time be anticipated, then an amended closure plan will be presented for approval.

265.119 Notice to Local Land Authority

At closure, all evidence of this hazardous waste storage and treatment facility operation will have been removed and the facility structure will revert to its original condition. No disposal will have been done at this facility.

265.120 Notice in Deed of Property

After closure of this facility operation, the physical structure will be returned to its owner in the condition found when originally occupied by ECCD. There will be no residuals which would be of harm to human health or the environment.

SUBPART H

FINANCIAL REQUIREMENTS

265.140 Applicability

ECCD being the operator of hazardous waste treatment, storage and disposal facility is responsible for compliance procedures pursuant to RCRA or regulations issued under the authority of RCRA.

265.141 Definitions

"For the purposes of this subpart, a compliance procedure is considered to be pending from the time an order or notice of intent to terminate is issued or judicial proceedings are begun until the Regional Administrator notifies the owner or operator in writing that the violation has been corrected or that the procedure has been withdrawn or discontinued."

"Standby Trust Fund" means a trust fund which must be established by an owner or operator who obtains a letter of credit or surety bond as specified in these regulations. The institution issuing a letter of credit or surety bond will deposit into the standby trust fund any drawings by the Regional Administrator on the credit or bond.

265.142 Cost Estimate for Facility Closing

This estimate is based on an orderly planned closure procedure by the operator of the facility.

dure	by the operator of the facility.	
1.	Cost of chlorinated solvent for decontam	nination
	purposes. 500 gallons @\$3.00	\$1,500.00
2.	Two men operating pump and decontamina-	
	tion. 80 man hours @\$10.00	800.00
3.	Drum disposal (one) including trans-	
	portation.	50.00
4.	Scrapped disposal of two drums.	100.00
5.	Dismantle machinery, equipment,	
	decontaminate.	1,050.00
6.	Dismantle diked storage areas and	
	decontaminate.	1,500.00
7.	Decontaminate balance of facility.	1,000.00
8.	Decontaminate and repair drives and	
	parking areas.	7,000.00
9.	Preparation of certificate of closure	
	and certification by a registered	
	professional engineer.	500.00
10.	Contingency.	1,500.00
		\$15,000.00

265.143 Financial Assurance for Facility Closure
East Coast Chemical Disposal, Inc. will provide a Surety
Bond guaranteeing performance of closure, in the amount of
fifteen thousand (\$15,000.00) dollars. The performance
bond for closure is worded according to Part 264.151(c).

264.144 Cost Estimate for Post-Closure Monitoring and Maintenance

Since there will be no disposal at this facility, and at the completion of closure no health or environmental hazards will exist, post-closure need not be implemented.

264.145 Financial Assurances for Post-Closure Monitoring and Maintenance

Post-Closure will not be needed (See Part 264.144).

265.146 Use of Mechanism for Financial Assurance of both Closure and Post-Closure

A surety bond (Performance) guaranteeing closure only will be submitted to the Regional Administrator by registered mail. (See Part 265.143)

264.147 Liability Requirements

ECCD will secure and maintain liability insurance for sudden occurrences in the amount of at least one million (\$1,000,000.00) dollars per occurrence with an annual aggregate of at least two million (\$2,000,000.00) dollars, exclusive of legal defense costs. An original signed duplicate of the insurance policy will be delivered to the Regional Administrator by certified mail and worded according to Part 265.151(e).

265.148 Incapacity of Institutions Issuing Letters of Credit, Surety Bonds or Insurance Policies Should the issuing Institution become bankrupt, insolvent, or have its license or charter suspended or revoked, the operator will establish financial assurances and liability coverage within 60 days of such events.

265.149 Applicability of State Financial Requirements
The Commonwealth of Pennsylvania has not yet established primacy in the issuance of Permits for HWM, no requirement.

265.150 State Assumption of Responsibility

The Commonwealth of Pennsylvania does plan to establish Permit primacy sometime in mid-year of 1982, at which time ECCD will meet any additional requirements.

265.151 Wording of the Instruments

The wording of the Closure Performance Surety Bond will be worded according to part 264.151 (c) and for the Hazardous Waste Facility Endorsement according to part 264.151 (g).

SUBPART I

USE AND MANAGEMENT OF CONTAINERS

265.170 Applicability

East Coast Chemical Disposal, Inc. believes that the primary containment source is the best containment source. The drum itself provides the best means of containment of a hazardous waste, and everything is done to protect the container during storage and handling operations. This includes using forklift trucks which are specially designed for handling drums. These trucks provide the best grip without damaging the drums. Personnel who will handle the containers are trained and tested in the proper operation of the forklift truck. The container storage areas are designed so that aisles are wide enough to allow easy movement of the forklifts around the containers. All of these precautions and procedures will minimize container damage.

265.171 Condition of Containers

Only D.O.T. specification drums are used to store hazardous waste. All containers are thoroughly inspected for damage, leaks, corrosion, etc., before we accept the container and its contents at this facility. Trained personnel continue to inspect these containers on a daily basis during the storage period to assure compliance with E.P.A. regulations.

When inspection of a container indicates that the container is not in an acceptable condition, the contents will immediately be transferred to an acceptable container. Containers holding hazardous waste will always be closed during storage except when it is necessary to add or remove waste.

265.172 Compatibility of Waste with Container

Containers used are of the type specified by the Department of Transportation. Should a container be received that does not meet specifications, the contents are transferred to an acceptable container. Prior to transferring the contents, at least four (4) tests must be made to verify its contents.

265.173 Management of Containers

Whenever inspection of a container indicates that the container is not in acceptable condition the contents are immediately transferred to an acceptable container. All containers holding hazardous waste will be closed during

storage except when it is necessary to add or remove waste. Prior to transferring the material, at least four (4) tests must be made to verify the contents.

Each containment area for drum storage is a concrete slab surrounded by a 6" x 6" concrete curb or dike. This area will have a thick layer of vermiculite for absorbtion of leak or small spills. This dike with vermiculite will prevent run-on or run-off thus preventing contamination beyond the diked area.

265.174 Inspections

All containers (drums) are inspected daily on operating days. This frequency insures early detection of any possible leaking containers.

Inspections are conducted with a general attitude of concern for personnel and environmental safety. Inspectors will look for proper labeling, leakers or any possible hazardous situation.

The Container Inspection Checklist will be documented immediately, initialed and dated by the inspector.

The slab and dikes will be checked for cracks and deterioration.

Each storage area will be inspected for accumulated leaks or spills and provision made for proper cleanup.

Inspectors will report any problems discovered during inspection to his immediate supervisor. The Supervisor in charge of the container storage area shall be responsible for directing necessary remedial action.

Checklist blocks are to be marked with OK or Not OK depending on which is appropriate.

- 1. If any situation required a Not OK, an explanation will include:
 - a. Description of problem.
 - b. Is there danger of imminent hazard.
 - c. Remedial action recommended, ie. transfer of leaking drums after 4 tests have been made to verify its contents.
- 2. Any remedial action records will include:
 - a. Description of action taken, ie. transfer of leaking drums.

- b. When this action is taken.
- c. Who performed the remedial action.
- d. Who performed the tests to confirm the contents prior to transferring and the results recorded.

265.176 Special Requirements for Ignitable or Reactive Wastes

For fire protection, to the extent possible, non-combustible and ignitable liquid containers will be stored alternately, which will provide a buffer zone between containers holding ignitable containers. Documentation of waste analysis or trial tests (total of at least 4) will be made in order to assure compliance with paragraph 265.17. All storage areas will prohibit the following by use of "No Smoking" signs.

Open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks (static, electrical, or mechanical), spontaneous ignition (e.g., from heat-producing chemical reactions), and radiant heat.

265.177 Special Requirements for Incompatible Wastes
The mixing or commingling of incompatible wastes will be
done so that the following actions are controlled:

- (a) Heat, pressure, fire, explosion or violent reactions.
- (b) Toxic mists, fumes, dusts or gases which threaten human health.
- (c) Uncontrollable flammable fumes or gases subject to fire or explosion.
- (d) The structural integrity of the containers or tanks.
- (e) All events which might threaten human health or the environment.

SUBPART J

TANKS

265.190 Applicability

At initial startup of this facility, Tanks will not be used for storage or treatment processing. However, it is anticipated that within an eighteen (18) month period, Subpart J will be amended to permit Tank usage.

265.191 Design of Tanks

At the time an amendment to this Subpart is desired, designs will be presented for approval to the Regional Administrator.

265.192 General Operating Requirements

Wastes and other materials will be placed only in tanks whose material of construction is compatible with the wastes, or is lined for protection from accelerated corrosion, erosion, or abrasion and the liner is compatible with the wastes. Liners shall be free of leaks, cracks, holes or other deterioration. Alternate methods of tank protection are cathodic protection or corrosion inhibitors.

Appropriate controls and practices will be used to prevent over filling, namely,

- Over filling controls such as waste feed cutoff system.
- 2. By-pass system to a standby tank.
- For uncovered tanks, maintenance of sufficient free board to prevent overtopping by wave, wind action or by precipitation.

265.193 Waste Analysis and Trial Tests

Each received container or liquid via Tank Trucks will have a manifest detailing the chemical and physical analysis of a representative sample of the waste. The analysis will contain information needed for proper treating, storage or disposal. Should such information not be made available ECCD may reject such container or have analysis performed in order to comply with EPA and/or DER requirements.

The following procedures will be followed:

- Obtain a representative pint sample from the container of hazardous waste using the numerical identifying system.
- Label sample and take it to the laboratory for analysis and percentage breakdown of components. Four such tests will be made.

- 3. After sampling, the container will be checked for bung gaskets, and that the bungs are tight - containers will set for 24 hours before stacking. It will be checked for leaks.
- 4. Containers will be stored in a safe manner according to the category issued by the laboratory.
- 5. Aisle ways and exits will be kept clear throughout the storage area.
- 6. Forklifts will observe all applicable general safety rules.

265.194 Inspection

- Once each operating day, overfill control equipment (waste feed cutoff system and by-pass systems) will be inspected.
- 2. Pressure and temperature gauges shall be checked daily.
- 3. To ensure compliance with part 265.192 (b)(2) check the level of waste each operating day.
- 4. Part of each working day, the area immediately surrounding tanks will be checked for leakage.
- 5. Tanks will be located inside this facilities building, and an inspection checklist has been developed.
- 6. Dike area surrounding tanks will have a thick layer of vermiculite for absorption of leaks and spills. See contingency plan for Chemical Spill Procedures.

Tank inspection will include inspection of:

- 1. All seams.
- 2. Supports.
- 3. Pumps.
- 4. Tank inlets and outlets.
- Tank vents.
- 6. Level indicator.

In controlling overfill, the operation is manual, with a person reading the level indicator and then shutting off a valve. The attendant is to be present at all times during the filling operation. When unloading from a truck, both the tank truck and facility operator will be present to monitor the operation.

Problems in this system can be alleviated by reversing the vacuum on the truck or releasing the air pressure in the truck. The actual inspection of the level indicators is performed by periodic maintenance.

All tanks will be periodically inspected at intervals determined by establishing the rate of corrosion or erosion observed. Probably once a year but may be done more fre-

quent. Inspection will be both visual and instrumental. (Ultrasonic transducer, etc.)

265.197 Closure

At closure all hazardous waste and hazardous waste residue will be removed from tanks, treated and prepared for disposal. Discharge control equipment and discharge confinement structures will be cleaned and decontaminated. All areas of the building will be checked and decontaminated as needed. Since all storage and treatment processes will be conducted within this fully enclosed building, no post-closure surveillance is deemed necessary.

When the closure is completed, all facility equipment and structures will be properly disposed of, or decontaminated by removing all hazardous wastes and residues.

The operator will then submit to EPA and/or DER certification both by the operator and an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan.

Probably not more than 5,000 gallons of liquid waste would be in inventory tank storage at any given time during the life of the facility.

265.198 Special Requirements for Ignitable or Reactive Wastes

Ignitable or reactive waste will be treated, rendered or mixed before or immediately after placement in the tank so that the resulting waste, mixture or dissolution of material no longer meets the definition of ignitable or reactive waste.

Or,

The waste will be stored or treated in such manner that it is protected from any material or conditions which might cause the waste to ignite or react.

Or,

The tank is used solely for emergencies and said covered tanks will comply with the <u>National Fire Protection Associations</u> buffer zone requirements for tanks. (Table 2-1 through 2-6 Flammable and Combustible Code - 1977)

265.199 Special Requirements for Incompatible Wastes The following will be so conducted that when storing or treating Incompatible Wastes the following will be prevented:

- 1. Extreme heat or pressure, fire, explosion or violent reaction.
- 2. Uncontrolled toxic mists, fumes, dust, or gases that threaten human health.

- 3. Uncontrolled flammable fumes or gases in quantities which would pose a risk of fire or explosion.
- 4. Damage the structural integrity of the device or facility containing the waste.
- Other actions which might threaten human health or environment.

Soiled solvent will be pumped into a hopper bottomed process tank (proposed) through a top inlet pipe so that material enters the tank through submerged filling.

A large outlet at the bottom of the hopper of the process tank will provide for draining off the heavy sediment and water.

After sediment removal, the top opening may be opened to channel processed soiled solvent to a distillation unit. For heavy hydrocarbons, the processed soiled solvent is run through to the distillation unit until the sludge and water layer is reached. At this point the outlet is closed and the bottom outlet is opened to drain the tank.

Processing in the hopper bottomed tank will normally require 48 hours resulting in a tank turnover frequency of three (3) working days. However, due to the nature of the product, management decision, or equipment failure, this period may be longer.

At the ECCD facility, material will be generated in the form of still bottoms and process tank bottoms. Uses for these bottoms will be sought from an environmental and economic standpoint.

All still and process tank bottoms will be thoroughly tested and manifested before leaving the premise.

Hazardous waste can be transported from the facility in either bulk or drums. Since ECCD will be the transporter and will have full control of this procedure. All material will be shipped in compliance with EPA, DER and DOT regulations (container specifications, labeling, placarding, shipping papers, etc.)

ECCD will transport this hazardous waste to one of two places. A federal or state approved landfill capable of accepting hazardous waste, or a federal or state approved destruction facility (burning, etc.).

TANK INSPECTION CHECKLIST

	Inspected By	Spent Chemical	Proper Aisle Space	Evidence of Cracking - Leaks Corrosion Erosion	Bulging	Waste Feed Cut-off System	By-Pass System	Condition of Surroundings		By-Weekly Interior Inspection		Pressure and Temperati
Date								Slab	Dike	Corrosion	Erosion	Gauges
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SUBPART K

SURFACE IMPOUNDMENTS

265.220 Applicability

No surface impoundments are to be a part of this application at this time. However, the application may be amended at some future time.

SUBPART L

WASTE PILE

265.250 Applicability

No waste piles are scheduled at present, therefore, they are not part of this application at this time. However, an amendment may be submitted at some future date.

SUBPART M

LAND TREATMENT

265.270 Applicability

Land treatment is not being considered at this time, therefore, it is reserved for future amendment of this application.

SUBPPART N

LANDFILL

265.300 Applicability

A future amendment to this subpart of the application is a distinct possibility.

SUBPART O

INCINERATOR

265.340 Applicability

We do not see an amendment under this subject for some time.

SUBPART P

THERMAL TREATMENT

265.370 Applicability

An amendment to this subpart is possible in the planning schedule.

SUBPART Q

CHEMICAL, PHYSICAL, AND BIOLOGICAL TREATMENT

265.400 Applicability

The regulations in this Subpart apply to owners and operators of facilities which treat hazardous wastes by chemical, physical, or biological methods in other than tanks, surface impoundments, and land treatment facilities, except as 265.1 provides otherwise. (Chemical, physical, and biological treatment of hazardous waste in tanks, surface impoundments, and land treatment facilities must be conducted in accordance with Subparts J, K, and M respectively.) For this project neither tanks, surface impoundments or land treatment facilities will be used initially in the start-up operations.

265.401 General Operating Requirements

- A. Chemical, physical or biological treatment of hazardous wastes will comply with 265.17(b).
- B. Hazardous wastes or treatment reagents will not be placed in the treatment process or equipment if they could cause the treatment process or equipment to rupture, leak, corrode, or otherwise fail before the end of its intended life.
- C. Where hazardous waste is continuously fed into a treatment process or equipment, the process or equipment will be equipped with a means to stop this inflow (e.g., a waste feed cut-off system or by-pass system to a standby containment device).

(Comment: These systems are intended to be used in the event of a malfunction in the treatment process or equipment. The basic treatment processing is the use of lime, soda ash, vermiculite or fly ash for neutralizing and solidification of container wastes.)

265.402 Waste Analysis and Trial Tests

In addition to the waste analysis required by 265.13, whenever:

- A. A hazardous waste which is substantially different from waste previously treated in a treatment process or equipment at the facility is to be treated in that process or equipment, or
- B. A substantially different process than any previously used at the facility is to be used to chemically treat

hazardous waste; the owner or operator must, before treating the different waste or using the different process or equipment:

- Conduct waste analyses and trial treatment tests (e.g., bench scale or pilot plant scale tests) totalling at least 4 tests; or
- 2. Obtain written, documented information on similar treatment of similar operating conditions; to show that this proposed treatment will meet all applicable requirements of 265.401 (a) and (b).

(Comment: As required by 265.13, the waste analysis plan must include analyses needed to comply with 265.405 and 265.406. As required by 265.73, the owner or operator must place the results from each waste analysis and trial test, or the documented information, in the operating record of the facility.)

265.403 Inspections

- A. The owner or operator of a treatment facility must inspect, where present:
 - Discharge control and safety equipment (e.g., waste feed cut-off systems, drainage systems and pressure relief systems) at least once each operating day, to ensure that it is in good working order.
 - 2. Data gathered from monitoring equipment (e.g., pressure and temperature gauges), at least once each operating day, to ensure that the treatment process or equipment is being operated according ot its design.
 - 3. The construction materials of the treatment process or equipment, at least weekly, to detect corrosion or leaking of fixtures or seams.
 - 4. The construction materials of, and the area immediately surrounding, discharge confinement structures (e.g., dikes), at least weekly, to detect erosion or obvious signs of leakage (e.g., wet spots or dead vegetation).

(Comment: As required by 265.15 (c), the owner or operator will remedy any deterioration or malfunction he finds.)

265.404 Closure

At closure, all hazardous waste and hazardous waste residues

must be removed from treatment processes or equipment, discharge control equipment, and discharge confinement structures.

(Comment: At closure, as throughout the operating period, unless the owner or operator can demonstrate, in accordance with 261.3 (c) or (d) of this Chapter, that any solid waste removed from his treatment process or equipment is not a hazardous waste, the owner or operator becomes a generator of hazardous waste and must manage it in accordance with all applicable requirements [of Parts 262, 263, and 265 of this Chapter].)

265.405 Special Requirements for Ignitable or Reactive Wastes

- A. Ignitable or reactive waste must not be placed in a treatment process or equipment unless:
 - 1. The waste is treated, rendered, or mixed before or immediately after placement in the treatment process or equipment so that:
 - a. the resulting waste, mixture, or dissolution of material no longer meets the definition of ignitable or reactive waste, and
 - b. 265.17 (b) is complied with; or
 - 2. The waste is treated in such a way that it is protected from any material or conditions which may cause the waste to ignite or react as stated under paragraph 265.176 of this report.

265.406 Special Requirements for Incompatible Wastes

- A. Incompatible wastes, or incompatible wastes and materials, (see Appendix V for examples) will not be placed in the same treatment process or equipment, unless 265.17 (b) and 265.177 of this report are complied with.
- B. Hazardous waste will not be placed in unwashed treatment equipment which previously held an incompatible waste or material, unless 265.17 (b) and 265.177 of this report are complied with.

SUBPART R

UNDERGROUND INJECTION

265.430 Applicability

An amendment to this subpart is possible within eighteen (18) months.

MUNICIPAL ENVIRONMENTAL ASSOCIATES, INC.

CONSULTING ENGINEERS

FINORE BUILDING - BETHLEHEM PIKE • P. O. BOX 627 • SPRING HOUSE, PENNSYLVANIA 19477
PHONE 215 628-2973

MESSAGE	REPLY
TO EPA Region III	DATE
6th + Walnut Street	
Philadelphia, PA 19106	
Re: Facility Layout DATE 7/8/05 Addendum Pout A+B attn. 91/ Horas	4.
Gentlemen:	
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MUNICIPAL ENVIRONMENTAL ASSOCIATES, INC.

CONSULTING ENGINEERS

FINORE BUILDING - BETHLEHEM PIKE • P. O. BOX 627 • SPRING HOUSE, PENNSYLVANIA 19477
PHONE 215 628-2973

MESSAGE	REPLY
TO EPA Region III	DATE
6th Walnut Streets	
Philadelphia, PA 19106	
DATE 6/2/82 attn: Gil Horwitz	
maximum number of drums	
en otorage will be:	
Non-Reactive free 576	
Rentine Ann 384	
Treatment area 150	
Theyo ment Area (tretal) 600	
Total 1718 drums	
BY Miles To Potter, BE	SIGNED

III Facility Layout - Details

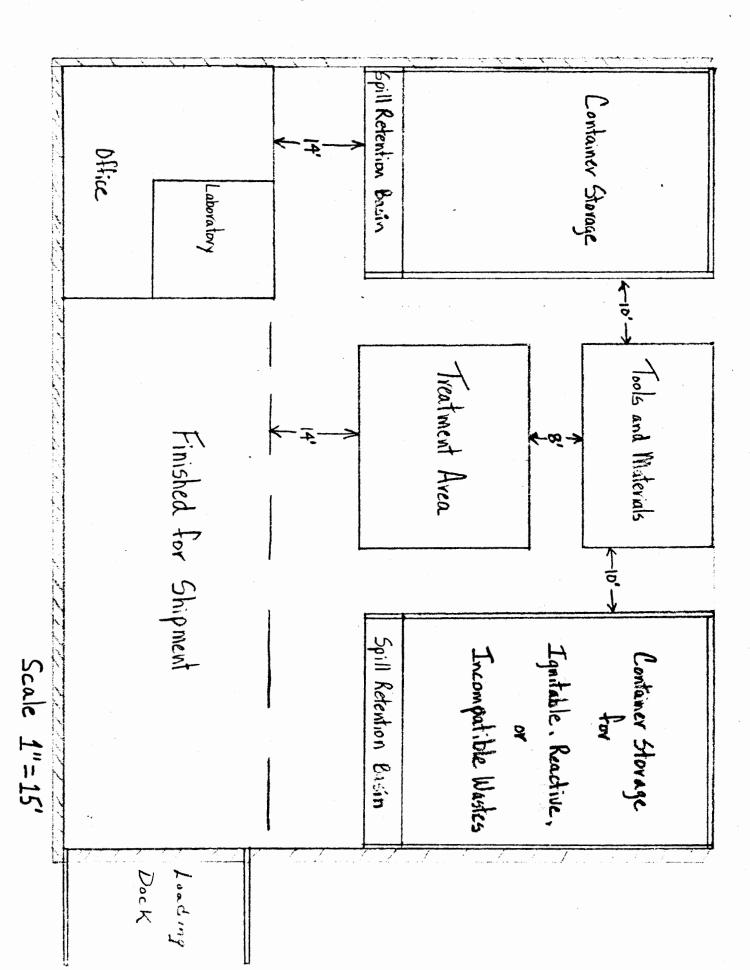
Each storage area is designed to hold a maximum of 144 drums of 50 gallon capacity (Appendix 2 and 3). Floors for the storage area slope at a rate of 1/8 inch per foot to a spill retention basin of 96 cubic feet. Drums will sit on a four (4) inch high pallet type platform. Storage areas will be diked using 8" x 8" x 16" concrete block.

The concrete floor of the facility will be coated with a prime coat of an H-B Epoxy and a final coat of Epoxy Enamel.

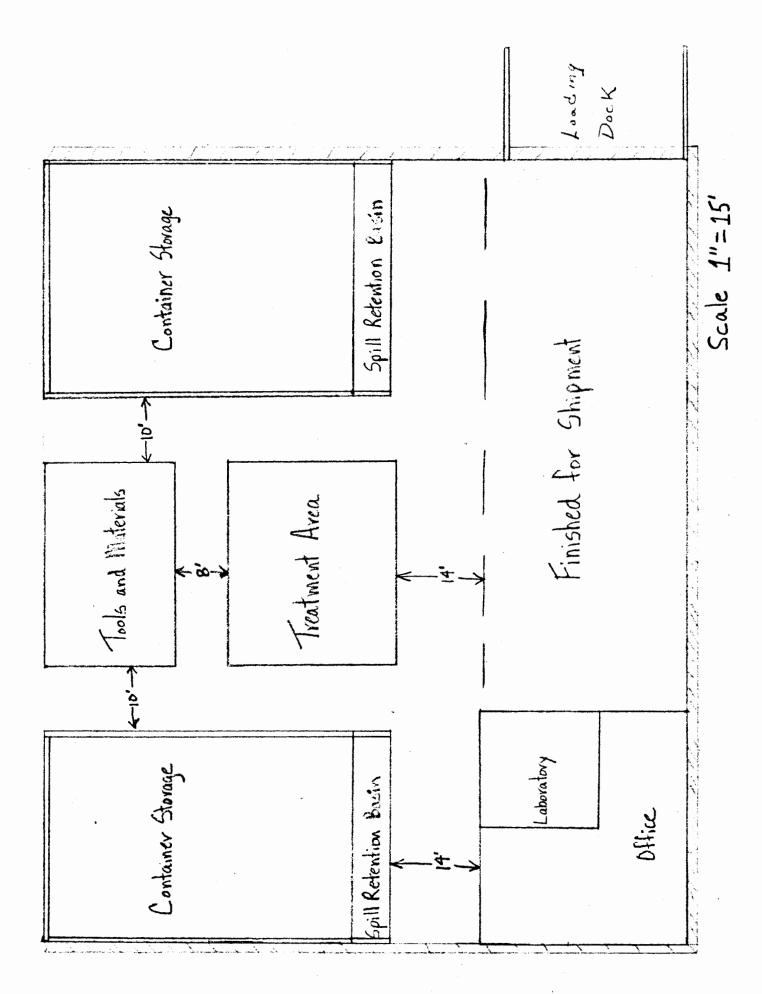
Compressive strength of this six (6) inch floor is thought to be in excess of 3,500 psi, since it is designed for heavy equipment.

Tools and materials will have an area of 600 square feet while the treatment area will have 780 square feet.

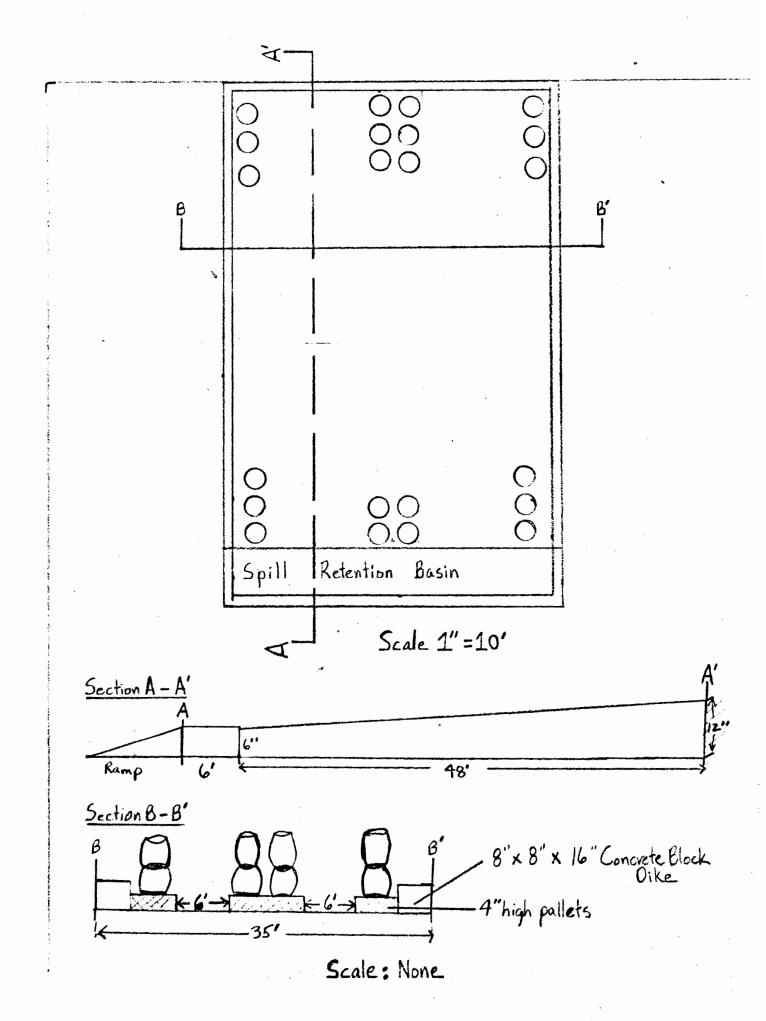
All storage areas have a minimum of 50 foot buffer on all sides.



ROVE 3/15



Appendix No. 2



Appendix No. 3

Subpart A - General (Addendum)

East Coast Chemical Disposal, Inc. will be treating hazardous wastes which will be received in drums and treated in drums for neutralizing of its components.

Subpart B - (Addendum)

As stated in Subpart B, Section 265.13 of this report, East Coast Chemical Disposal, Inc. basic treatment operations are to neutralize acids, caustics, and to raise flash points to an acceptable level for transportation to certified Class Al disposal areas. The hazardous wastes received by ECCD will not be a total concentrated acid or alkaline. However, the compounds found in the drums for treatment will be acidic or alkaline, and will be neutralized by items such as fly ash, lime, vermiculite, baking soda.

Addendum to Addendum No. 1

When ECCD makes laboratory analyses of wastes received to be sure of correct identification, representative samples will be taken to exhibit the average properties of the universe or whole (e.g., waste or groundwater).

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III. PROCESSES (continued)

SPACE FOR ADDITIONAL PROCESS CODES OR AR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

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Liquid and Semi-solid Wastes are picked up from originator (Mfg. or user) and hauled to an enclosed facility for treatment. Here it is solidified, packaged in drums, and hauled by a certified hauler to a certified disposal area. Some liquid wastes are hauled to a solvent recovery area.

IV. DESCRIPTION OF HAZARDOUS WASTES

- A. ENA HAZARDOUS WASTE NUMBER Enter the four-digit number from 40 CFR, Support D for each listed hazardous waste you will handle. If you le hezardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number(s) from 40 CFR, Subpart C that describes the character istreand/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column Agestimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE COD	METRIC UNIT OF MEASURE CODE
POUNDSP	KILOGRAMSK
TONS	METRIC TONS

if facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

- 1. PROCESS CODES:
 - For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes, If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter 'included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

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EPA Form 3510-3 (6-80)

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Municipal Environmental Associates, Inc.

Consulting Engineers
Finore Building — Bethlehem Pike
P. O. Box 627
Spring House, Penna. 19477
Phone 215 628-2973

December 22, 1981

EPA Region III 6th & Walnut Streets Philadelphia, PA 19106

Re: Permit Application - Hazardous Waste East Coast Chemical Disposal, Inc.

Attn: Mr. Paul Gotthold

Gentlemen:

Enclosed are the following completed forms submitted in behalf of the subject referenced client:

1. Form 1 General

a. USC & GS

- 2. Form 3 RCRA
 - a. Facility Drawing
 - b. Photographs

Should you have any questions on this application please call the writer. We wish to be cooperative.

Sincerely yours,

Miles B. Potter, P.E.

MBP/fr

Encl.

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3 SEPA	HA	ZARDOU	IRONMENTAL PROTECTION JS WASTE PERMI Consolidated Permits Protection is required under Sec	T APPLICATION	I. EPA I.D.	NUMBER	T/A
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APPROVED (yr., mo., & day)				COMMENTS			
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II. FIRST OR REVISED APPL	ICATI	ON					
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GALLONS PER DAY		LITERS PER HOUR	egint regional de la company de la compa		
EXAMPLE FOR COMPLETIN	IG ITEM III (shown in	line numbers X-1 and X-2 below	: A facility has two st	orage tanks, one tank can hold 20	30 gallons and the

example for completing item III (shown in line numbers A-1 and A-2 below). A leading has an other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

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EPA Form 3510-3 (6-80)

PAGE 1 OF 5

CONTINUE ON REVERSE

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

Liquid and Semi-solid Wastes are picked up from originator (manufacturer or users) and hauled to an enclosed facility for treatment. Here it is solidified, encapsulated and hauled by certified hauler to a certified disposal area. Some liquid wastes are hauled to solvent recovery areas. (To 4) 360,000 GAL/DAY

TOI 25,000 GAL/DAY

IV. DESCRIPTION OF HAZARDOUS WASTES

- A. EPA HAZARDOUS WASTE NUMBER Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number/s/ from 40 CFR, Subpart C that describes the character tics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non—listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE	METRIC UNIT OF MEASURE	COD
POUNDS P	KILOGRAMS	. K
TONS	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual
 quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- 2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non—listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

			A	E	P				UNIT									D. PROCESSES
LINE NO.			TIMATED ANNUAL NTITY OF WASTE	1 5	MEA- SURE (enter code)			1	. PF		SS iter	CODE	5	2. PROCESS DESCRIPTION (if a code is not entered in $D(1)$)				
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X- 2		D	1	0	0	2	400		P	T	0	3	D^{\top}	8 0		1 1		
X -3	3	D	T	0	0	1	100		P	T	0	3	D^{T}	8 0		, ,		
X-4	ı	D	1	0	0	2					1		Т	T		11		included with above

the second section is	EPA I.D. NUMBER (enter from page 1)				/	1	FOR OFFICIAL USE ONLY									
W			- 13 14 15	$^{\prime}$	/	\	W	DUP				7/A C D U P				
IV.	DESCRI	PTIC	ON OF HAZARDOUS WAST			-	nued)	Q. T. P. A.			7. S. J. J.					
LINE NO.	A. EP HAZAI WASTE (enter co	NO.	B. ESTIMATED ANNUAL QUANTITY OF WASTE	0	.UN FME SUR ente code	A- E r	 Control of the control of the control	1. PR	(en	SS CODE	\$	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))				
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5	K 0 0	2	1258		T		T-0-4	50)	TOY	1					
6	K 0 0	2	968		T		T 0 1	Se	2	TOI	, ,					
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X, OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

James Williams

William

Continued from page 4.	Form	Approved OMB No	. 158-S80004
V. FACILITY DRAWING (see page 4)			
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S SEPA	HAZARDOL	IRONMENTAL PROTECTION IS WASTE PERMI Consolidated Permits Protection is required under Sec	T APPLICATION	I. EPA I.D. NUMBE	R 7/A C 1				
FOR OFFICIAL USE ONLY APPLICATION DATE RECEIVE APPROVED (yr., mo., & day)			COMMENTS						
23 24 - 2	•								
II. FIRST OR REVISED APP									
Place an "X" in the appropriate bo revised application. If this is your EPA I.D. Number in Item I above.	first application and	you already know your f	acility's EPA I.D. Number, o	application you are submi r if this is a revised applicat	tting for your facility or a lion, enter your facility's				
A. FIRST APPLICATION (pla 1. EXISTING FACILITY	(See instructions for Complete item belo	definition of "existing" w.)	facility.	X 2.NEW FACILITY (Complete item below.) FOR NEW FACILITIES, PROVIDE THE DATE				
8	e the boxes to the lef	"	UCTION COMMENCED	9 2 0 1 0 2 73 74 75 76 77 78	(yr., mo., & day) OPERA- TION BEGAN OR IS EXPECTED TO BEGIN				
B. REVISED APPLICATION 1. FACILITY HAS INTE		and complete Item I abo	ve)	2. FACILITY HAS A	RCRA PERMIT				
III. PROCESSES – CODES A	ND DESIGN CAP	ACITIES							
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other can hold 400 gallons. The fa	rility also has an inc	nerator that can burn up	to 20 gallons per hour.	TTTTTT	\overline{A}				
	13 14 15	1111	1111111	ROCESS DESIGN CAP	77777				
A. PRO- CESS CODE	S DESIGN CAPAC	2. UNIT OF MEA- SURE (enter code)	M CESS	1. AMOUNT	2. UNIT OF MEA- SURE (enter (code)				
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1 260,00	0	G	7						

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C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES ($code\ "T04"$). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

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ENGLISH UNIT OF MEASURE CODE	METRIC UNIT OF MEASURE	CODE
POUNDS,	KILOGRAMS	K
TONS	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual
 quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- 2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to dascribe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

	A. EPA		C. UNIT	D, PROCESSES								
	HAZARD. WASTENO (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	SURE (enter code)	1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in $D(1)$)							
X-1	K 0 5 4	900	 P	T 0 3 D 8 0								
X-2	D 0 0 2	400	 P	T 0 3 D 8 0								
X-3	D 0 0 1	100	P	T 0 3 D 8 0								
X-4	D 0 0 2				included with above							

 	EPA	1.0). N	MU	BER (enter from page 1)			Y	s					FO	RO	FFIC	IAL	USE	ONLY			-1 '		\setminus	\setminus	\setminus	/	/ /
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		Z 1			N OF HAZARDOUS WASTE						\geq			7	.,		* * * * *							94,177,2				
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26	23			26	27 - 35		36					27		29	27	- 29												

Continued from the front.						
IV. DESCRIPTION OF HAZARDOUS WASTES (co. E. USE THIS SPACE TO LIST ADDITIONAL PRO		S EROM ITEM D/1)	ON PAGE 3			
E. USE THIS SPACE TO LIST ADDITIONAL PRO	CESS CODE	S FROM TIEM D(I)	ON FAGE 3.			
	N/A					
						_
EPA I.D. NO. (enter from page 1)						つ
F 7/A c 6						
V. FACILITY DRAWING All existing facilities must include in the space provided on	nace 6 a coale	drawing of the facility	(see instructions for more	dotaill		\$0,003 in
VI. PHOTOGRAPHS	page 5 a scale	drawing of the facility i	see instructions for more	Oe tan).		
All existing facilities must include photographs (aeri	ial or ground	I_level that clearly c	lelineate all evisting st	ructur	es existing storage	
treatment and disposal areas; and sites of future stor	rage, treatme	ent or disposal areas	see instructions for m	ore de	tail).	
VII. FACILITY GEOGRAPHIC LOCATION					300 - 10 - 10 - 10 - 10 - 10 - 10 - 10 -	
LATITUDE (degrees, minutes, & seconds	į		LONGITUDE (degrees	, minut	es, & seconds)	
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VIII. FACILITY OWNER						
A. If the facility owner is also the facility operator as I	listed in Section	on VIII on Form 1, "Ge	neral Information", place	an "X"	in the box to the left	t and
skip to Section IX below.						
B. If the facility owner is not the facility operator as I	isted in Sectio	n VIII on Form 1, comp	plete the foll owi ng items			
1. NAME OF FACIL	LITY'S LEGA	LOWNER		2.	PHONE NO. (area co	de &
E East Coast Chemical Dispos	ol Too					$\Pi\Pi$
E East Coast Chemical Dispos	al inc.			55 56	- 58 59 - 61 62	<u> </u>
3. STREET OR P.O. BOX		4. CITY OR	TOWN	5. ST.	6. ZIP COD	
F 1971 Hartel Street	Ĝ	Levittown		PA	1 9 0 5 8	
11. 11.6	45 15 16		# # # # # # # # # # # # # # # # # # #	41 42		
IX. OWNER CERTIFICATION						
I certify under penalty of law that I have personally documents, and that based on my inquiry of those in	examined ar ndividuals in	nd am familiar with t	he information submit le for obtaining the in	tted in formai	this and all attache ion. I believe that t	d he
submitted information is true, accurate, and comple	te. I am awa	re that there are sign	ificant penalties for su	bmitti	ng false information	1,
including the possibility of fine and imprisonment.						
A. NAME (print or type)	B. SIGNAT	URE		C. DA	TE SIGNED	سينت التعاد
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Mark Beinant	1//	ark see	man	ر د	16/82	_
X, OPERATOR CERTIFICATION						
I certify under penalty of law that I have personally	examined ar	nd am familiar with t	he information submi	tted in	this and all attache	d
documents, and that based on my inquiry of those in	ndividuals in	nmediately responsib	le for obtaining the in	format	tion, I believe that t	he
submitted information is true, accurate, and comple including the possibility of fine and imprisonment.	te. I am awa	re that there are sign	ificant penalties for su	omitti	ng tai s e informatioi	7,
A. NAME (print or type)	B. SIGNAT		_		TE SIGNED	
James Williams	1	9. 1	2.0	3	15/8/	

EPA Form 3510-3 (6-80)

PAGE 4 OF 5

CONTINUE ON PAGE 5

RESOURCE CONSERVATION AND RECOVERY ACT PERMIT

EPA Identification/Permit No: PAD 98 055 1162
Name of Permittee: <u>East Coast Chemical Disposal</u> , Incorporated
Issue Date:
Effective Date:
Expiration Date:
This permit issued under the authorization of the Resource Conservation and Recovery Act authorizes treatment and storage of hazardous wastes by
East Coast Chemical Disposal Incorporated 365 Pleasantview Avenue Hackensack, New Jersey 07606
for the facility at
1971 Hartel Street Levittown, Pennsylvania 19058
The permittee shall act in accordance with all terms and conditions of this permit, whether stated verbatim or incorporated by reference.
Issued thisday of
by

General Conditions:

1. Definition

Specialized words used in this permit shall have the meanings and definitions set forth in 40 C.F.R. Parts 122 and 260.

2. Permit Compliance a. Duty to comply

- (1) The permittee must comply with all conditions of this permit. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any condition of this permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action including permit termination, revocation and reissuance, or modification or for denial of a permit renewal application. In addition, criminal or civil actions may be brought in appropriate instances.
- (2) This permit may be modified, revoked, reissued, or terminated as defined in 40 C.F.R. §§122.15, 122.16, 122.17.
- (3) It is not a defense in an enforcement action for the permittee to assert that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (4) The terms of this permit do not affect the obligation of permittee to comply with all applicable Federal, State and local laws and regulations.

b. Imminent and Substantial Endangerment to Health and the Environment

Notwithstanding any other provisions of this permit, enforcement actions may be brought pursuant to Section 7003 of RCRA, 42 U.S.C. §6973.

c. Duty to Mitigate

The permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from non compliance with this permit.

d. Duty to Reapply

If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must apply for and obtain a new permit.

e. Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege.

3. Construction Compliance

The permittee must submit to the Regional Administrator a letter signed by the permittee and an independent registered professional engineer stating that the hazardous waste container storage area was constructed as described in the attached Part B application. No hazardous waste container storage will be permitted until the EPA has inspected the new facility for compliance or has waived the requirement for inspection.

4. Personnel

a. Personnel Training

- (1) Facility personnel must complete the attached Part B application training program within three months after the date of their employment or assignment to the facility, or to a new position at the facility. Personnel must not work in unsupervised positions until they have completed the training program. Personnel must, where applicable, take part in annual reviews of the required initial training. Logs documenting completion of training will be maintained for each employee and kept for the duration of this permit.
- (2) If any person employed is not skillful in the English language, then the permittee will provide appropriate training in the primary language of the employee.

b. Emergency Coordination

The permittee will ensure that at all times there will be at least one employee designated as emergency coordinator either on the premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with responsibility for coordinating all emergency response measures. The emergency coordinator

must in addition to carrying out the responsibilities specified in 40 C.F.R. §264.56, be throughly familiar with all aspects of the facility's contingency plan, all operations and activities at the facility, and the location layout. In addition, this person must have the authority to commit the resources needed to carry out the contingency plan in the attached Part B application.

5. Operation and Maintenance

a. Proper Operation and Maintenance

- (1) The permittee must at all times properly operate and maintain all facilities and systems of control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of backup of auxiliary facilities or similiar systems only when necessary to achieve compliance with the conditions of this permit.
- (2) The permittee must maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

b. Testing and Maintenance of Equipment

The permittee must test and maintain all facility communications or alarm systems, fire protection equipment, and any required spill control equipment to assure its proper operation in time of emergency, as outlined in the attached Part B application. This testing must be done at the time of permit issuance and must be done at least every six months from the date of issuance of this permit and records documenting the testing will be maintained at the facility for three years from the date of the testing.

c. Security

- (1) The permittee must prevent the unknowing entry and minimize the possibility for the unauthorized entry of persons or livestock onto the active portions of this facility. As described in the attached Part B application a fence will be constructed and maintained to completely surround the active portion of the facility and the permittee will provide security measures to control entry at all times through gates or other entrances to active portion of the facility.
- (2) The permittee must post signs which indicate that only authorized personnel are allowed to enter the active portion and that entry into the active portion can be dangerous. Such signs must be posted at each entrance to the active portion of the facility, and at other locations, in sufficient numbers to be seen from any approach to this active portion. This legend must be written and must be legible from a distance of at least 25 feet.
- (3) The permittee will provide in writing to the EPA the name of the security service that will patrol the facility on holidays, weekends, etc. When the permittee changes the service the EPA will be advised in writing within seven (7) days after the change.
- (4) The permittee will advise the EPA if unauthorized entry at the facility occurs causing hazardous waste to be discharged, the nature of problems, if any, that have resulted from this occurrence and corrective action taken by the facility to prevent future happenings. This includes any tampering, destruction or loss at the facility which causes release of hazardous waste.

d. Access to Communications or Alarm System

Whenever hazardous waste is being poured, mixed, or otherwise handled, the permittee must ensure that all personnel involved in the operation will have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee.

e. General Inspection Requirements

- (1) The permittee must inspect the facility as per the inspection plan outlined in the attached Part B application for malfunctions and deterioration, operator errors, and discharges.
- (2) The permittee must follow the written schedule outlined in the attached Part B application for inspection of monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment (such as dikes).
- (3) The permittee must remedy, according to a schedule approved by the EPA, any observed deterioration or malfunction of equipment or structure to ensure that the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or a release has already occurred, remedial action will be taken immediately and reported, in writing, to the EPA, within seven (7) days after the occurrence.
- (4) The permittee must record inspections in an inspection log or summary. The log or summary shall be kept for at least three years from the date of inspection. At a minimum, these records will include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions.
- (5) The permittee will notify the EPA when an unintended discharge of more than 50 gallons of hazardous waste occurs at any time in the total facility complex. A written report describing the incident and remedial measures taken will be submitted to the EPA within seven (7) days of the occurrence.

f. Waste Analysis Plan

The permittee must follow the waste analysis plan described in the attached Part B application and must keep this plan at the facility.

g. Implementation of Contingency Plan

The permittee must immediately carry out the provisions of the contingency plan contained in the attached Part B application whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents.

h. Copies of Contingency Plan

The permittee must keep a copy of the attached Part B application contingency plan and all revisions of this plan at the facility and will submit the plan and all revisions to all local Fire Departments, Hospitals, and State and Local Emergency Response Teams that may be called to provide emergency services.

i. Amendment of Contingency Plan

The permittee must review the contingency plan and submit the plan to the EPA for review whenever:

- (1) The Permit is revised;
- (2) The plan fails in an emergency;
- (3) The facility changes -- in its design, construction, plan or method of operation, storage capacity, maintenance, or other circumstances which exist on the date of issuance of this permit -- in a way that increases the potential for fires, explosions, or release of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;
- (4) The list of emergency coordinators changes; or
- (5) The list of emergency equipment changes. (Note: a change in the lists of facility emergency coordinators or equipment in the contingency plan constitutes a minor modification to the permit to which the plan is a condition).

j. General Requirements for Ignitable, Reactive or Incompatible Wastes

(1) The permittee must take precautions to prevent accidental ignition or reaction of ignitable or reactive waste. This waste will be separated and protected from sources of ignition or reaction including, but not limited to: open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks (static, electrical, or mechanical), spontaneous ignition (e.g., from heat-producing chemical reactions) and radiant heat. When ignitable or reactive waste is being handled, the permittee will prohibit smoking, hot surfaces, and open flames or any other source of ignition in at least the following designated locations: laboratory drum storage area. "No smoking" signs will be placed wherever there is a hazard from ignitable or reactive waste.

- (2) The permittee must take precautions to prevent reactions which:
 - (a) Generate extreme heat or pressure, fire or explosions, or violent reactions;
 - (b) Produced uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health or the environment;
 - (c) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion;
 - (d) Damage the structural integrity of the device or facility; or
 - (e) Through other like means threaten human health or the environment.
- (3) The permittee must take precautions to prevent mixing of incompatible wastes in the same container.

k. Arrangements with Local Authorities

- (1) By the effective date of this permit the permittee will have:
 - (a) Familiarized the local Police Department, Fire Department, and State and Local Emergency Response Teams with the layout of the facility and associated hazards, places where facility personnel will normally be working, entrances to and roads inside the facility, and possible evacuation routes;

- (b) Informed local emergency groups of safety equipment suppliers or proper emergency safety procedures that are applicable to the site;
- (c) Familiarized the local hospitals with the properties of hazardous wastes handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility; and
- (d) obtained an agreement from those Agencies in (1)(a) and (c) of this condition, designating primary emergency authority and support to the primary emergency authority.
- (2) Where State or local authorities decline to enter into such arrangements, the permittee must document the refusal in the operating record.

Monitoring

All samples and measurements taken for the purpose of monitoring incoming waste drums, containment collection liquids or other chemical process wastes must be representative of the waste and samples shall be collected as specified in the attached Part B application.

7. Records

Unless otherwise specified, all records and/or copies thereof required to be maintained by terms of this permit will be kept on-site for at least three years. This period may be extended by the request of the Regional Administrator at any time. All records, including plans required by this permit, must be furnished upon request and made available for inspection as outlined in regulation 40 C.F.R. §264.74.

a. Monitoring Record

The permittee must retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation and sampling information.

b. Contents of Monitoring Record

Records of monitoring information shall include:

- (1) The date, exact place, and time of sampling or measurements;
- (2) The individual(s) who performed the sampling or measurements;
- (3) The date(s) analyses were performed;
- (4) The individual(s) who performed the analyses;
- (5) The analytical techniques or methods used; and
- (6) The result of such analyses.

c. Operating Record

The permittee must keep a written operating record at the facility. The following information will be recorded, as it becomes available, and maintained in the operating record until closure of the facility:

- (1) A description and the quantity of each hazardous waste received, and the methods(s) and the date(s) of its storage at the facility;
- (2) The location of hazardous wastes within the facility and the quantity at each location, and cross-reference to specific manifest documents numbers, if the waste was accompanied by a manifest;
- (3) Records and results of waste analysis performed;
- (4) Summary reports and details of all incidents that require implementation of the contingency plan;
- (5) Any required notices to generators;
- (6) All closure cost estimates; and
- (7) All inspection logs described in the attached Part B application.

d. Manifests

Whenever the facility receives hazardous wastes accompanied by a manifest, the permittee or its agent must:

- (1) Sign and date each copy of the manifest to certify that the hazardous waste covered by the manifest was received;
- (2) Note any significant discrepancies in the manifest on each copy of the manifest;
- (3) Immediately give the transporter at least one copy of the signed manifest;
- (4) Within thirty (30) days after the delivery, send a copy of the manifest to the generators; and
- (5) Retain at the facility a copy of each manifest for at least three (3) years from the date of delivery.

e. Manifest Discrepancies

Upon discovering a significant discrepancy (defined in regulation 40 C.F.R. §264.72) the permittee will attempt to reconcile the discrepancy with the waste generator or transporter. If the discrepancy is not resolved within fifteen (15) days after receiving the waste the permittee will immediately submit to the Regional Administrator a letter describing the discrepancy and attempt to reconcile it, and a copy of the manifest or shipping paper at issue.

f. Personnel Records

The permittee must maintain the following documents and records at the facility:

(1) The job title for each position at the facility relating to hazardous waste management, the name of the employee filling each job, and a written job description for the position. This description, at, a minimum, will include the requisite skill, education, other qualifications and duties of employees assigned to each position.

- (2) A written description of the amount and type of both introductory and continuing training that will be given to each person filling a position relating to hazardous waste management; and
- (3) Record documenting that the required training has been given to, and successfully completed by, facility personnel.

g. Availability, Retention, and Disposition of Records

- (1) The permittee must furnish all required records, including plans, upon request and must make these records available at all reasonable times for inspection by any officer, employee, or representative of the EPA who is duly designated by the Administrator.
- (2) The retention period for all required records is extended automatically during the course of any unresolved enforcement action regarding the facility or as required by the Regional Administrator.

8. Other Conditions

a. Duty to Provide Information

The permittee must furnish to the Regional Administrator, within a specified time, any information which the Regional Administrator may request to determine whether cause exists for modifying, revoking and reissuing or terminating this permit, or to determine compliance with this permit. The permittee shall also furnish to the Regional Administrator, upon request, copies of records required to be kept by this permit.

b. Planned Changes

The permitte must give notice to the Regional Administrator as soon as possible of any planned physical alterations or additions in the permitted facility or activity. This requirement shall not be construed to authorize noncompliance.

c. Transfer

This permit is not transferable to any person except after notice to the Regional Administrator and upon written consent to its terms and conditions by the new owner and operator. The Regional Administrator may require modification or a "minor modification" (regulation 40 C.F.R. §122.17) or revocation and reissuance of the permit to change the name of the permittee and incorporate such other requirements as may be necessary under the Act.

d. Signatory Requirements

All reports required by this permit and any other information requested by the Regional Administrator must be signed by the corporate president or vice president or a duly authorized representative who has authority to commit the company.

e. Compliance Schedules

Reports of compliance or noncompliance with, or any progress reports on interim and final requirements contained in any compliance schedule of this permit must be submitted no later than fourteen (14) days following each scheduled date.

f. Twenty-four Hour Reporting

The permittee must report any noncompliance which may endanger health or the environment such as a spill of more than 50 gallons of a hazardous waste, a fire, an explosion, any occurrence which requires the use and operation of the contingency plan, or other such occurrences. Any information shall be provided orally as soon as possible but no later than 24 hours from the time the permittee becomes aware of the circumstances.

- (1) The following information must be reported orally as soon as possible, but no later than 24 hours after the incident has occurred:
 - (a) Information concerning release of any hazardous waste that may endanger public drinking water supplies;

- (b) Any information relating to a release or discharge of hazardous waste, or to a fire or explosion from the facility, which could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:
 - (i) Name, address, and telephone number of the facility;
 - (ii) Date, time, and type of incident;
 - (iii) Name and quantity of material(s)
 involved;
 - (iv) The extent of injuries, if any;
 - (v) An assessment of actual or potential hazards to the environment or human health outside the facility, where this is applicable; and
 - (vi) Estimated quantity and disposition of recovered material that resulted from the incident.
 - (vii) Name of an emergency contact if different than emergency coordinator.
- (2) A written submission must be provided within seven (7) days of any orally reported noncompliance. This submission must contain a description of the noncompliance and its cause; the date and time(s); and if the noncompliance has not been corrected, the anticipated time it is expected to continue and projected date when it will be corrected; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance.

g. Other Noncompliance

The permittee must report all instances of noncompliance not reported under paragraphs (a), (b), (e), and (f) above at the time monitoring reports are submitted. The reports shall contain the information listed in paragraph (f) of this condition.

h. Mandatory Notification Procedures

- (1) The permittee must notify the Regional Administrator in writing at least four (4) weeks in advance of the date the permittee expects to receive hazardous waste imported from a foreign country. Notice of subsequent shipments of the same type of hazardous waste from the same foreign country is not required.
- (2) Prior to receiving hazardous waste from an off-site source the permittee must inform the generator in writing that the permittee has the appropriate permit(s) for, and will accept, the waste the generator is shipping. The permittee must keep a copy of this written notice as part of the operating record.

i. Unmanifested Waste Report (40 C.F.R. §264.76)

If the facility accepts hazardous waste for treatment or storage without an accompanying manifest or shipping paper, then the permittee must prepare and submit a single copy of a report to the Regional Administrator within 15 days after receiving the waste, unless the waste is excluded from the manifest requirement. The report form and instructions in Appendix II of 40 C.F.R. Part 264 will be used for this report. The report must include the following information:

- (1) The EPA identification number, name and address of the facility;
- (2) The date the facility received the waste;
- (3) The EPA identification number, name and address of the generator and the transporter if available.
- (4) A description and the quantity of each unmanifested hazardous waste received;
- (5) The method of treatment or storage; and
- (6) The certification signed by the permittee or the owner or his authorized representative.

j. Government Inspection and Entry

The permittee shall allow the Regional Administrator or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to:

- Enter upon the permitee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
- (2) Have access, at reasonable times, to copy any records that must be kept under the conditions of this permit;
- (3) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
- (4) Sample or monitor at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the appropriate Act, any substances or parameters at any location.

9. Closure (40 C.F.R. Part 264 Subpart G)

- a. The permittee must follow the closure plan as outlined in the Part B application.
- b. A copy of the closure plan and all revisions to it must be kept at the facility until closure is completed and such completion has been certified by an independent, registered, professional engineer.
- c. Whenever there are changes of operation during the active life of the facility (defined as that period during which wastes are periodically received) which affect the closure plan, the plan must be amended. The permittee must submit to the Regional Administrator proposed amendments of the plan wherever changes in operating plans or facility design affect the closure plan, or whenever there is a change in the expected year of closure. When the permittee requests a permit modification to authorize a change in operating plans or facility design, the permittee must submit a modification of the closure plan at the same time. If the operations or design changes are authorized by the Regional Administrator, the closure plan must reflect

the authorized changes. If a permit modification is not needed to authorize the change in operating plans or facility design, the request for modification of the closure plan must be made within 60 days after the change in plans or design occurs.

- d. The permittee must notify the Regional Administrator at least 180 days prior to the date it expects to begin closure.
- e. When closure is completed, the permittee must submit to the Regional Administrator certification both by the permittee and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. At closure of the facility, the permittee will ensure that any remaining containers, liners, bases, and spills that contain hazardous waste or hazardous waste residue are disposed of in accordance with applicable environmental regulations.
- 10. Financial Responsiblity (40 C.F.R. Part 264 Subpart H)
 - a. Whenever a change in the closure plan affects the cost of closure, the permittee must prepare a new cost estimate and accordingly adjust the amount of funds available through the financial assurance mechanism.
 - b. The permittee must comply with the requirements of financial responsibility for the cost of closure of the facility set forth in 40 C.F.R. Part 264, Subpart H, on or before July 6, 1982, or by the effective date of the permit if this date is later than July 6, 1982. The permittee will submit appropriate documentation to the EPA of its compliance with these requirements forty-five (45) days prior to the effective date. Regardless of whether this documentation is submitted and initially approved on or before the effective date of 40 C.F.R. Parts 264 and 265, the permittee must comply with all deadlines set forth in the regulations.
 - c. The permittee must comply with the requirements set forth in 40 C.F.R. Part 264, Subpart H for liability coverage for bodily injury and property damage to third parties resulting from facility operations by July 15, 1982, or by the effective date of the permit if this date is later than July 15, 1982. The permitee will submit appropriate documentation to the EPA forty-five (45) days prior to the effective date. Regardless of whether this documentation is approved before the effective date, the permittee must comply with all deadlines set forth in the regulations.

Special Conditions

1. Permit Period

This permit is issued for a period of ten 10) years from this date and shall expire on unless terminated.

2. Description of Material

Hazardous waste permitted to be stored at the facility shall be limited to those wastes listed below:

- D001 General ignitable waste solvents (flash point less than 140°F).
- The spent halogenated solvents used in degreasing and other applications, tetrachloroethylene, trichloroethylene, methylene chloride, l,l,l, trichloroethane, carbon tetrachloride, and the chlorinated fluorocarbons; and sludges from the recovery of these solvents.
- The spent halogenated solvents, tetrachloroethylene, methylene chloride, trichloroethylene, 1,1,1, trichloroethane, chlorobenzene, 1,1,2 trichloro 1,2,2 trifluoroethane, ortho-dichlorobenzene and trichlorofluoromethane, and the still bottoms from the recovery of these solvents.
- The spent non-halogenated solvents, xylene, acetone, ethyl acetate ethyl benzene, ethyl ether, methyl isobutyl ketone, n-butyl alcohol, cyclohexanone and methanol, and the still bottoms from the recovery of these solvents.
- F005 The spent non-halogenated solvents, toluene, methyl ethyl ketone, methyl isobutyl ketone, carbon disulfide, isobutanol, pyridine, and still bottoms from the recovery of these solvents.
- K086 Solvent washes and sludges, caustic washes and sludges or water washes and sludges from cleaning tubs and equipment used in the formulation of ink from pigments, driers, soaps, and stabilizers containing chromium and lead.

U002 Acetone U031 N-butyl alcohol Chloroform U044 U045 Chloromethane U075 Dichlorodifuoromethane Dichloromethane U080 U112 Ethyl acetate U140 Isobutyl alcohol Methanol U154 U159 Methyl ethyl ketone U161 Methyl isobutyl ketone U171 2-Nitropropane U210 Tetrachloroethylene U213 Tetrahydrofuran U220 Toluene 1,1,1, Trichloroethane U226

3. Amount of Material

Total storage capacity shall not exceed 300/55 gallon containers.

4. Storage Requirements

a. Management of Containers

- (1) Hazardous wastes shall be stored in containers that are maintained in good condition with no evidence of leaks, severe rusting, bulging, corrosion, or apparent structural defects. If a container is not in good condition or begins to leak, all hazardous waste shall be transferred from this container to a container that is in good condition or the waste shall be managed in some other way that complies with the requirements of regulation 40 C.F.R. §264.171.
- (2) Containers shall be made of or lined with materials which will not react with, and are otherwise compatible with, the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired.
- (3) A container holding hazardous waste shall always be closed during storage except when it is necessary to add or remove waste.

- (4) Containers holding hazardous waste shall not be opened, handled, or stored in a manner which may rupture the container or cause it to leak.
- (5) All containers shall be stored in the designated area outlined in the Part B application.
- (6) Containers shall be stored and stacked in accordance with the following requirements:
 - (a) ignitable and reactive hazardous waste stored in containers shall be stacked no greater than two (2) high. The storage configuration of these containers shall be groups of four (4) wide and four (4) deep, or the containers shall be grouped so that the maximum width of a group is no greater than the area that would contain two 55 gallon drums wide, with the depth of the group so limited that at least a five foot wide aisle surrounds the group. Each group of four (4) by four (4) shall be separated by at least a five (5) foot wide aisle.
 - (b) All non-ignitable and non-reactive hazardous waste stored in containers shall be stacked no greater than three (3) high. The maximum width of a group of containers shall be no greater than four 55-gallon drums wide. The maximum depth shall be limited to the number of drums which will allow a minimum aisle width of two feet six inches at both ends of a row. The minimum aisle space between and surrounding groups of containers shall be no less than two feet six inches. The width shall be sufficient to insure access for purposes of inspection, containment and remedial action with emergency vehicles.
- (7) All containers holding ignitable or reactive waste shall be at least 15 meters (50 feet) from the facility's property line, as outlined in the attached Part B application.
- (8) Ignitable or reactive waste stored in containers shall comply with requirements of General Condition 5.j. of this permit.

(9) The permittee shall inspect, as outlined in the attached Part B application, the area where containers are stored, looking for leaking, rusting, or bulging containers and for other deterioration of containers (i.e., punctures) and containment system. Inspections must be executed in accordance with the attached Part B application Inspection Plan.

b. Storage Cell Requirements

- (1) The concrete base underlying the containers shall be a minimum of 6 inches thick, maintained free of cracks or gaps and shall be sufficiently impervious to contain leaks and spills. The concrete shall be of a high quality and have a compressive strength of at least 3500 PSI.
- (2) Each storage cell collection system will maintain the capacity to contain 10% of the total volume of all the containers stored in the containment area as outlined in the attached Part B application. Containers shall be elevated in accordance with the attached Part B application.
- (3) Any hazardous waste that spills or leaks shall be removed from the collection area in as timely a manner as is necessary to prevent overflow of the collection system.
- (4) Any material removed from the collection system (if it meets the definition of a hazardous waste in regulation 40 C.F.R. Part 261) shall be returned to a hazardous waste container, transferred to other hazardous waste management facilities included in this permit or managed in some other way that complies with applicable requirements of 40 C.F.R. Parts 262-264 and complies with the other requirements of this permit.
- (5) Any deterioration of or malfunction in equipment or structures of the containment system (including leaks, cracks, permeable areas) revealed by any inspection shall be remedied by the permittee on a schedule approved by the EPA.

c. Special Requirements For Incompatible Waste

- (1) Incompatible waste or materials are not to be stored in the same container unless the requirements of General Condition 5.j. of this permit are complied with.
- (2) Hazardous waste shall not be placed in an unwashed container that previously held an incompatible waste or material.
- (3) Any storage container holding hazardous waste that is incompatible with any waste or other materials stored nearby in other containers shall be separated from the other materials or protected from them by means of a dike, berm, wall, or other device.

5. Treatment Requirements

a. General Requirement

Containers used for physical treatment of waste shall be subject to all General and Special Conditions in this permit relating to containers.

b. Operating Requirements

- (1) Physical treatment of hazardous wastes listed in the Part A application must be confined to addition of inert thickening agents and neutralizing agents, acids and bases to 55 gallon containers.
- (2) All treatment must take place in the area described in the attached Part B application. This area shall be covered and have a containment area as shown in the attached Part B application. This area is subject to all conditions of 40 C.F.R. §264.175.
- (3) The permittee must use appropriate controls to prevent spillage from uncovered containers. Sufficient freeboard must be maintained to prevent overtopping during the addition of thickening agents and mixing of the contents.

- (4) Materials that are incompatible with the contents of a container or with the material of construction of a container shall not be placed in a container.
 - (a) Waste analysis and trial treatment tests (e.g. bench scale tests) shall be conducted to ensure compatibility.
- (5) The owner or operator of a treatment facility must inspect the construction materials of the surrounding area and dikes, at least weekly, to detect erosion, cracks or obvious signs of leakage.